

EXHIBIT 1

From: Bryan Tyson <btyson@taylorenghish.com>

Sent: Tuesday, October 13, 2020 7:01 PM

To: Cross, David D. <DCross@mofo.com>; Rashmi Ahuja <rahuja@taylorenghish.com>; cichter@ichterdavis.com; bbrown@brucepbrownlaw.com; Carlin, John P. <JCarlin@mofo.com>; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Kaiser, Mary <MKaiser@mofo.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Brogan, Eileen M. <EBrogan@mofo.com>; jpowers@lawyerscommittee.org; dbrody@lawyerscommittee.org; erosenberg@lawyerscommittee.org; kaye.burwell@fultoncountyga.gov; david.lowman@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; ram@lawram.com; hknapp@khlawfirm.com; sparks@khlawfirm.com; grant.schnell@hklaw.com

Cc: Jonathan Crumly <jcrumly@taylorenghish.com>; Diane LaRoss <dlaross@taylorenghish.com>; James Balli <jballi@taylorenghish.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Loree Anne Paradise <lparadise@taylorenghish.com>; Drina Miller <dmiller@taylorenghish.com>; Vincent Russo <vrusso@robbinsfirm.com>; jbelinfante@robbinsfirm.com; adenton@robbinsfirm.com; cmiller@robbinsfirm.com; Kim Bunch <Kim.Bunch@robbinsfirm.com>

Subject: RE: Curling, et al. v. Raffensperger, et al. - State Defendants' Objections and Responses to Plaintiffs' Fourth Joint RPDs and Inspection of Things to State Defendants

External Email

David,

We are not producing the databases requested in 19(a) and 23(a) due to the temporal objections that we are currently running the November election. After that election is over, we expect to be able to produce those databases pursuant to the protective order.

For the remaining requests, we will stand on our temporal objections during the election and our other objections after the election and will withhold all documents.

Thanks,

Bryan



Bryan P. Tyson

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From: Cross, David D. <DCross@mofo.com>

Sent: Tuesday, October 13, 2020 3:41 PM

To: Rashmi Ahuja <rahuja@taylorenghish.com>; cichter@ichterdavis.com; bbrown@brucepbrownlaw.com; Carlin, John

P. <JCarlin@mofo.com>; Hedgecock, Lyle F. <LHedgecock@mofo.com>; Kaiser, Mary <MKaiser@mofo.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Brogan, Eileen M. <EBrogan@mofo.com>; jpowers@lawyerscommittee.org; dbrody@lawyerscommittee.org; erosenberg@lawyerscommittee.org; kaye.burwell@fultoncountyga.gov; david.lowman@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; ram@lawram.com; hknapp@khlawfirm.com; sparks@khlawfirm.com; grant.schnell@hklaw.com

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Vincent -

Do I read your responses correctly as indicating you're refusing to provide anything at all in response to every one of these requests? The repeated statement that you're with holding responsive materials based on your objections is unclear as to whether that means some materials or all materials requested. Please immediately clarify.

Thanks.

DC

From: Rashmi Ahuja <rahuja@taylorenghish.com>

Date: Tuesday, Oct 13, 2020, 3:36 PM

To: cichter@ichterdavis.com <cichter@ichterdavis.com>, bbrown@brucepbrownlaw.com <bbrown@brucepbrownlaw.com>, Cross, David D. <DCross@mofo.com>, Carlin, John P. <JCarlin@mofo.com>, Hedgecock, Lyle F. <LHedgecock@mofo.com>, Kaiser, Mary <MKaiser@mofo.com>, Ascarrunz, Veronica <VAscarrunz@mofo.com>, Brogan, Eileen M. <EBrogan@mofo.com>, jpowers@lawyerscommittee.org <jpowers@lawyerscommittee.org>, dbrody@lawyerscommittee.org <dbrody@lawyerscommittee.org>, erosenberg@lawyerscommittee.org <erosenberg@lawyerscommittee.org>, kaye.burwell@fultoncountyga.gov <kaye.burwell@fultoncountyga.gov>, david.lowman@fultoncountyga.gov <david.lowman@fultoncountyga.gov>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, ram@lawram.com <ram@lawram.com>, hknapp@khlawfirm.com <hknapp@khlawfirm.com>, sparks@khlawfirm.com <sparks@khlawfirm.com>, grant.schnell@hklaw.com <grant.schnell@hklaw.com>

Cc: Bryan Tyson <btyson@taylorenghish.com>, Jonathan Crumly <jcrumly@taylorenghish.com>, Diane LaRoss <dlaross@taylorenghish.com>, James Balli <jballi@taylorenghish.com>, Bryan Jacoutot <bjacoutot@taylorenghish.com>, Loree Anne Paradise <lparadise@taylorenghish.com>, Drina Miller <dmiller@taylorenghish.com>, Vincent Russo <vrusso@robbinsfirm.com>, jbelinfante@robbinsfirm.com <jbelinfante@robbinsfirm.com>, adenton@robbinsfirm.com <adenton@robbinsfirm.com>, cmiller@robbinsfirm.com <cmiller@robbinsfirm.com>, Kim Bunch <Kim.Bunch@robbinsfirm.com>

Subject: Curling, et al. v. Raffensperger, et al. - State Defendants' Objections and Responses to Plaintiffs' Fourth Joint RPDs and Inspection of Things to State Defendants

External Email

Dear Counsel:

Attached please find the following:

- State Defendants' Objections and Responses to Plaintiffs' Fourth Joint Request for Production of Documents and Inspection of Things to State Defendants

Sincerely,
Rashmi



Rashmi Ahuja | Paralegal

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[Website](#)

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